

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
Statesville Division

CROWN EQUIPMENT CORPORATION,	)	
	)	
Plaintiff,	)	
	)	Case No. 5:23-cv-00059-KDB-DCK
v.	)	
	)	
DAVID BRADY, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**UNOPPOSED MOTION TO EXTEND TIME TO ANSWER FOR**  
**DEFENDANT PNEU-MECH SYSTEMS MANUFACTURING, LLC**

Defendant Pneu-Mech Systems Manufacturing, LLC (“Pneu-Mech LLC”), by counsel, hereby makes this unopposed motion to extend Pneu-Mech LLC’s deadline to respond to Plaintiff’s Complaint until August 21, 2023. Pneu-Mech LLC’s counsel has conferred with Plaintiff’s attorneys, who have indicated that they do not oppose this motion. Further, Pneu-Mech LLC has good cause for requesting an extension to respond to Plaintiff’s Complaint. Pneu-Mech LLC was administratively dissolved by the North Carolina Secretary of State in June 2021. Counsel for Defendants Brady, Tucker, Brawtus Holdings, Inc., and Brawtus Management Company, LLC have, until now, made every effort to identify the individuals who must respond on behalf of Pneu-Mech LLC. Now that their identities have been ascertained, Pneu-Mech LLC is preparing an answer to Plaintiff’s Complaint, which is 210 pages and contains a multitude of legally and factually complex claims, all of which must be addressed thoroughly. The parties respectfully request that this court establish August 21, 2023, as Pneu-Mech LLC’s deadline to answer.

Dated: July 12, 2023

Respectfully submitted,  
BY COUNSEL

/AbbiWHarris/

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## **CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served the foregoing on the following counsel of record who are CM/ECF participants:

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